

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

NICOLE COLLYMORE and FAISAL  
MALIK, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

NORTH SHORE UNIVERSITY  
HOSPITAL,

Defendant.

**No. 16-cv-6584-LDW-SIL**

**PROPOSED SCHEDULING ORDER FOR EXPEDITED DISCOVERY AS TO THE  
TWO NAMED PLAINTIFFS AND BRIEFING FOR DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to the Court's order at the Pre Motion Conference held on May 1, 2017 (Dkt. 25), the parties hereby submit this Proposed Scheduling Order for expedited discovery relevant to Defendant's motion for summary judgment with respect to the named Plaintiffs' individual claims:

**1. Expedited Discovery.**

a. **Written Discovery and Productions.** The parties will begin exchanging documents relevant to the motion for summary judgment (Dkt. 22) immediately on a rolling basis pending confidentiality stipulation (if applicable) and identification of requests by Plaintiffs. Additionally, written discovery shall be conducted according to the following deadlines:

- i. Plaintiffs shall identify any informal document requests by May 10, 2017.

- ii. Defendant shall serve written responses by June 11, 2017. Documents shall be produced on a rolling basis as they become available, but no later than by June 11, 2017.

b. **Depositions.** Plaintiffs shall serve a Rule 30(b)(6) deposition notice by May 10, 2016. Depositions will be held according to the following schedule:

- i. Plaintiff Collymore: May 12, 2017.
- ii. Plaintiff Malik: May 18, 2017.
- iii. Defendant's 30(b)(6) witnesses: June 7, 2017.

2. **Summary Judgment.** Summary judgment shall be briefed according to the following schedule:

- a. Defendant's Motion for Summary Judgment shall be served by May 25, 2017.
- b. Plaintiffs' Opposition to Summary Judgment shall be served by June 23, 2017.
- c. Defendant's Reply brief shall be served by July 10, 2017.

3. **All other proceedings stayed.** Except as provided above, all other discovery is stayed and briefing on Plaintiffs' motion to certify the FLSA collective action (Dkt. 21) is stayed pending the Court's determination on Defendant's motion for summary judgment.

Dated: May 5, 2017

**JONES DAY**

By: /s/ Amanda Sommerfeld  
Amanda Sommerfeld  
555 South Flower Street, 15th Floor  
Los Angeles, CA 90071  
Tel: 213-243-2174

*Counsel for Defendant*

**GARDY & NOTIS, LLP**

By: /s/ Orin Kurtz\*  
Orin Kurtz  
126 East 56th Street, 8th Floor  
New York, NY 10022  
Tel: 212-905-0509  
Fax: 212-905-0508  
okurtz@gardylaw.com

*Counsel for Plaintiff*

\*Electronic signature added with permission of attorney.